

## REMARKS

Claims 1, 5, 25, 32, 58, 61, and 71 have been amended. Claims 1-77 remain pending.

### Section 112 Claim Rejections

Claims 25 and 32 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In response to these rejections, applicant amended the preamble of claim 25, which currently reads as follows:

A method for processing currency bills with a multiple-stage currency processing system ~~comprising~~ having a first stage including a plurality of first stage currency processing devices having at least one output receptacle, a second currency processing stage including at least one currency processing device having a plurality of output receptacles, and a third currency processing stage including a plurality of currency processing devices having at least one output receptacle, the method comprising:

Applicant also amended the preamble of claim 71 for a similar reason. Applicant respectfully submits that the above amendment places claims 25 and 71 in condition for allowance.

The applicant thanks the Examiner for noting that claim 32 contains a clear inventive concept. In light of the above, claim 32 was rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicant further amended the original language of claim 32 in accordance with the Examiner's suggestion to further clarify the claimed subject matter. Applicant respectfully submits that amended claim 32 is in condition for allowance, and such action is solicited.

### **Section 103 Claim Rejections**

Claims 1-6, 11-48, and 50-77 stand rejected under 35 U.S.C. § 103(a) based on U.S. Patent No. 5,917,930 (Kayani) in view of commonly owned U.S. Patent Application Publication No. 2004/0003980 (Hallowell). Claims 7-10 and 49 stand rejected under 35 U.S.C. § 103(a) based on Kayani in view of commonly owned U.S. Patent Application Publication No. 2004/0003980 (Hallowell) further in view of official notice.

Applicant respectfully submits that, pursuant to Section 103(c)(1), Hallowell cannot be used to reject the present claims under Section 103(a) because it qualifies as prior art only under Section 102(e). Hallowell and the present application were commonly owned by or subject to assignment to the same assignee, Cummins-Allison Corporation, at the time the inventions described in the present application were made. *See* attached Statement of Common Ownership of Prior Art Citation and Invention to Disqualify Prior Art Under 35 U.S.C. § 103(c). As such, a *prima facie* case for obviousness cannot be made based upon the presently applied references.

### **Independent Claim 1**

Regarding Kayani, Kayani fails to disclose, teach, or suggest all of the elements of independent claim 1. Generally, Kayani fails to disclose, teach, or suggest a currency processing system with a plurality of first devices, at least one second device, and a plurality of third devices. Kayani also fails to disclose, teach, or suggest a central processing unit to compare first totals to second totals and to compare third totals with fourth totals.

Specifically, claim 1 recites, *inter alia*, the following elements:

(1) “a plurality of first stage currency processing devices . . . adapted to denominate currency bills . . . each first batch having an associated first total corresponding to the value of the currency bills in a respective first batch”

(2) “a third currency processing stage for receiving the second batches from the second stage, the third stage having a plurality of third stage currency processing devices each . . . adapted to count currency bills and to suspend operation when a predetermined number of currency bills are transported to the at least one output receptacle, the third stage devices each being adapted to determine a fourth total associated with each second batch processed by a third stage device, each fourth total corresponding to the value of the currency bills in a respective second batch processed by third stage devices”

(3) “a central processing unit interfaced with each of the first, second, and third stage currency processing devices, the central processing unit adapted to receive information from each of the first, second, and third stage currency processing devices, the central processing unit being adapted to compare first totals to second totals, the central processing unit being adapted to compare third totals to fourth totals”

Kayani only discloses a single currency processing machine that sorts the individual currency notes into bins according to their denomination. (column 5, lines 63-66.) Accordingly, at best, Kayani only discloses a “second stage currency processing device having a plurality of output receptacles.” It does not teach or suggest system comprising three stages of devices. In this regard, Kayani fails to disclose, teach, or suggest “a plurality of first stage currency processing devices . . . adapted to denominate currency bills.” Thus, Kayani’s does not disclose, teach, or suggest a plurality of first stage currency processing devices adapted to output a plurality of first batches.

Additionally, Kayani, fails to disclose, teach, or suggest “a third currency processing stage for receiving the second batches from the second stage, the third stage having a plurality of third stage currency processing devices . . . adapted to count currency bills” and “adapted to determine a fourth total.” Rather, Kayani only discloses a single currency processing machine that sorts the individual currency notes into bins according to their denomination. (column 5, lines 63-66.) Specifically, Kayani fails to disclose, teach, or even suggest a third stage device.

Lastly, Kayani fails to disclose, teach, or suggest “a central processing unit interfaced with” a plurality of first stage devices, at least one second stage device, and with a plurality of third stage devices, as recited in claim 1. Rather, Kayani only discloses a single currency processing machine (column 5, lines 63-66) without a central processing unit adapted to receive information from a plurality of first devices, at least one second device, and a plurality of third devices. Moreover, the Examiner admits in the office action that Kayani fails to disclose such a central processing device. (See O.A. page 4–5.)

However, the Examiner noted that “central processors and Computerization are inherent in modern accounting and machine control applications and likely part of Kayani’s implementation.” (O.A. page 5.) Applicant respectfully asserts that whether or not Kayani’s implementation includes computerization is irrelevant because Kayani fails to disclose, teach, or suggest such a central processing unit interfaced with each of the first, second, and third stage currency processing devices; Kayani fails to even disclose more than one currency processing device, let alone three separate and distinct stages of currency processing devices.

Regarding Hallowell, as discussed above, Hallowell is not prior art to this application; however, even if Hallowell is prior art, the office action still fails to establish a *prima facie* case of obviousness because Kayani and Hallowell, both individually and in combination, fail to disclose, teach, or suggest “a central processing unit interfaced with” a plurality of first devices, at least one second device, and with a plurality of third devices, as recited in claim 1. Additionally, both Kayani and Hallowell fail to disclose, teach, or suggest a central processing unit “adapted to compare first totals to second totals” and “to compare third totals to fourth totals” as recited in claim 1.

Thus, the applied references fail to disclose, teach, or suggest all of the claim elements in independent claim 1. The Applicant respectfully asserts that that the office action has not established a *prima facie* case of obviousness for claim 1. Thus, for at least the reasons stated above, independent claim 1, and all claims depending therefrom, is non-obvious and in condition for allowance, and such action is solicited.

**Independent Claims 25, 32, 46, 54, 70, 71, 75, and 78**

Claim 25 contains at least the following limitation neither taught nor suggested by Kayani:

- receiving currency bills to be processed in the first stage currency processing devices;
- denominating the received currency bills with one or more of the first stage devices;
- grouping currency bills denominated by the one or more first stage devices into a plurality of first batches, each first batch having an associated first total corresponding to the value of currency bills in the first batch;
- receiving one or more of the first batches from the first stage currency processing devices in the at least one second stage currency processing device;
- ... comparing the first totals to the second totals;
- ... receiving one or more second batches in the one or more third stage currency processing devices;
- counting the currency bills of each received second batch with one or more of the plurality of third stage currency processing devices;
- determining a fourth total for each received second batch with the one or more third stage currency processing devices, each fourth total corresponding to the value of the currency bills in a second batch; and
- comparing the third totals to the fourth totals.

Accordingly, the Applicant respectfully asserts that that the office action has not established a *prima facie* case of obviousness for claim 25 and respectfully maintains that claim 25 is in condition for allowance. Claim 32 contains similar limitations and is likewise believed to be allowable.

Claim 46 recites, *inter alia*:

a first stage including a plurality of compact currency handling devices adapted to denominate and count currency bills...;

a second stage including a high-capacity currency handling device adapted to denominate, count, and sort currency bills, the high-capacity device having multiple output receptacles;

a third stage including a plurality of compact currency handling devices adapted to count currency bills...; and

a controller operatively coupled with the first, second, and third stages, the controller adapted to receive and to compare information related to the counting of currency bills at each stage.

Claim 46 is believed to be allowable because Kayani and Hallowell, alone and in combination fail to teach or suggest such a three stage system.

Claim 54 recites, *inter alia*:

receiving one or more deposits including currency bills at the first stage;  
denominating and counting the received currency bills using at least one compact currency handling device at the first stage;

receiving currency bills denominated and counted in the first stage at the second stage;

denominating, counting, and sorting the currency bills received at the second stage using a high-capacity currency handling device;

receiving currency bills denominated, counted, and sorted in the second stage at the third stage;

counting the currency bills received at the third stage using at least one compact currency handling device; and

comparing information related to the counting of currency at each of the first, second, and third stages with a controller interfaced with each of the at least one compact currency handling device of the first stage, the high-capacity currency handling device of the second stage, and the at least one compact currency handling device of the third stage.

Claim 54 is believed to be allowable because Kayani and Hallowell, alone and in combination fail to teach or suggest such a method processing currency.

Claim 70 recites, *inter alia*:

a first currency processing stage for receiving account deposits including currency bills, the first stage including a plurality of first stage currency processing devices each being adapted to denominate currency bills, each first stage device being adapted to output a first batch of currency bills, each first batch

having an associated first total corresponding to the value of the currency bills in the respective first batch;

a second currency processing stage for receiving first batches from the first stage...;

a third currency processing stage for receiving the second batches from the second stage, the third stage having a plurality of third stage currency processing devices being adapted to count currency bills of the received second batches, the third stage devices being adapted to determine a fourth total associated with each second batch processed by the third stage devices, each fourth total corresponding to the value of the currency bills in the respective second batch processed by third stage devices; and

a central processing unit communicatively linked to each of the first, second, and third stage currency processing devices, the central processing unit being adapted to compare the first totals to the second totals and to compare the third totals to the fourth totals.

Claim 70 is believed to be allowable because Kayani and Hallowell, alone and in combination fail to teach or suggest such a multi-stage currency processing system.

Claim 71 recites, *inter alia*:

receiving deposits including currency bills to be processed in the first currency processing stage;

denominating the received currency bills with one or more of the first stage devices;

determining the value of the currency bills in each received deposit, each deposit having an associated first total corresponding to the value of currency bills in the deposit;

assigning a first batch number to each deposit;

transmitting, to the central computer, the first batch number and corresponding first total for each deposit received in the first stage;

receiving one or more deposits from the first currency processing stage in the second currency processing stage;

entering the first batch number for each deposit into an operator interface communicatively linked to the central computer;

...

comparing respective first and second totals;

...

assigning a second batch number to each second batch;

transmitting, to the central computer, the second batch number and corresponding third total for each second batch;

receiving one or more second batches in the third currency processing stage;

entering the second batch number for each second batch into an operator interface communicatively linked to a central computer;

counting the currency bills of each received second batch with one or more of the plurality of third stage currency processing devices;

determining a fourth total for each received second batch with the one or more third stage currency processing devices, the fourth total corresponding to the value of the currency bills in a respective second batch; and  
comparing respective third and fourth totals.

Claim 71 is believed to be allowable because Kayani and Hollowell, alone and in combination fail to teach or suggest such a method processing currency.

Thus, for at least the same reasons discussed above, all claims depending from the independent claims are non-obvious and in condition for allowance, and such action is solicited.

In light of the above, Applicant does not address all the remarks made by the Examiner. However, Applicant's silence does not mean he concurs with such remarks.

Applicants make the following additional remarks.

With respect to the two cases cited on page 5 of the Office Action, Applicants point out that these cases cannot be construed change the law of obviousness as set forth by the Supreme Court and the Federal Circuit. Additionally, these cases do not overcome the above arguments relating to the allowability of the pending claims.

With respect to claims 12,13, 33, and 34, the Office Action refers to "error detection capabilities and cites Kayani (col.6, line 15). Applicant maintains that the cited portion of Kayani fails to teach or suggest the limitations of these claims as actually recited.

With respect to claim 15 and 35, the cited portion of Kayani fails to teach or suggest the recited limitations at least for the reason that Kayani fails to teach or suggest a third stage device at all.



With respect to claim 58, the Examiner refers to MPEP 2016.01 and concludes that “the inclusion of a variety of data for data entry in a data entry field is non-functional descriptive material...” and “will not be given any patentable weight.” This rejection is respectfully traversed. MPEP 2016.01 is not applicable to amended claim 58. Amended claim 58 recites, *inter alia*, “receiving at least one of a checks total in the checks total data entry field, a credit card total in the credit card total data entry field, or an other total in the other total data entry field.” As such, it is directed to a statutory process being performed by a machine and is entitled to patentable weight. Furthermore, Kayani fails to teach or suggest such a method and fails to teach or suggest any method involving check or credit card totals.

### CONCLUSION

In view of the above, it is believed that the currently pending claims are in condition for allowance, and the Examiner is respectfully requested to pass this application to issuance. If there are further questions or comments, the Examiner is invited to contact the Applicant's representative at the telephone number indicated below.

The applicant authorizes the Commissioner to deduct any fees due for the petition for a two-month extension from Nixon Peabody LLP Deposit Account No. 50-4181, Order No. 247171-000252USPT. Should any additional fees be deemed necessary, the Commissioner is authorized to also deduct the necessary fees (except for payment of the issue fee) from Nixon Peabody Deposit Account No. 50-4181, Order No. 247171-000252USPT.

Respectfully submitted,

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